

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**JOINT STATUS REPORT**

Consistent with the Court's Order in Docket No. 241 (Feb. 25, 2024), the Parties submit this joint status report in advance of the Court's upcoming May 29, 2024 status conference.

**I. JOINT MOTION AND STIPULATION FOR AN ORDER FOR REPRODUCTION OF DISCOVERY**

Regarding the Parties' previously filed Joint Motion for an Order for Reproduction of Discovery, on which the Court held a hearing on May 6, 2024, the Plaintiff States have proposed a joint stipulation that Defendant Google is considering. The States intend to work with Google to get an agreed stipulation on file. The Parties will be prepared to discuss that issue with the Court.

**II. UPDATE ON DEPOSITIONS AND DISCOVERY**

Pursuant to the Court's Orders (ECF Nos. 457, 458), the Parties are on schedule to complete all fact depositions in this case by Friday, May 24, 2024—with the exception of the fact depositions of Google witnesses Sergey Brin and Sundar Pichai, on which the Court has requested supplemental briefing three business days after the May 24, 2024 deposition of Neal Mohan (ECF No. 459). The Parties will submit that supplemental briefing by May 30, 2024.

Regarding the Court's and the Special Master's Orders on the States' Rule 30(b)(6) deposition, that deposition will take place on May 24, 2024, and the States are working diligently to prepare their witness to fully comply with the Court's and the Special Master's Orders.

As to other discovery issues, the Parties have been negotiating and working with the Special Master to resolve any remaining discovery issues. There are no other currently pending issues that are ripe for resolution by the Court.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that, on May 24, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Geraldine Young  
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